



{In Archive} Fw: EPA's Draft Technical Report re In-Situ Uranium Activity

Stacey Dwyer to: Philip Dellinger, Ray Leissner, Jose Torres

08/29/2011 07:26 AM

From: Stacey Dwyer/R6/USEPA/US
To: Philip Dellinger/R6/USEPA/US@EPA, Ray Leissner/R6/USEPA/US@EPA, Jose Torres/R6/USEPA/US@EPA
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----- Forwarded by Stacey Dwyer/R6/USEPA/US on 08/29/2011 07:25 AM -----

From: Stacey Dwyer/R6/USEPA/US
To: "Venice Scheurich" <jave241@sbcglobal.net>
Date: 08/29/2011 07:12 AM
Subject: Re: FW: EPA's Draft Technical Report re In-Situ Uranium Activity

Good Morning Mrs. Venice,
I apologize for not responding to your email earlier, however, I've been out of the office since early Wednesday afternoon (August 24) and I'm just receiving your email. I will need to look into this issue a bit further. The document that you are referring to was authored by the Air and Radiation Division, in Headquarters. This Division's main function is to protect against radiation risks and monitor air quality. I will have Phil Dellinger, who attended the meeting, look into this issue with our Headquarters contacts.

If you will send me your phone number, I will call you by Thursday of this week.

Stacey B. Dwyer
Associate Director
Source Water Protection Branch
U.S. EPA Region 6
214-665-7150 phone

"Venice Scheurich" [Hello, Stacey,](#)

08/24/2011 04:21:32 PM

From: "Venice Scheurich" <jave241@sbcglobal.net>
To: Stacey Dwyer/R6/USEPA/US@EPA
Date: 08/24/2011 04:21 PM
Subject: FW: EPA's Draft Technical Report re In-Situ Uranium Activity

[Hello, Stacey,](#)

I am concerned that a very significant piece seems to be missing in the June 2011 Draft Technical Report. (See e-mails below.)

As you see, Rich Abitz has discovered the same omission.

I'm not sure how to further address this matter. Do you have suggestions?

Best regards,

[Venice](#)

From: Venice Scheurich [mailto:jave241@sbcglobal.net]
Sent: Wednesday, August 24, 2011 3:57 PM

To: 'richabitz@gmail.com'

Subject: RE: EPA's Draft Technical Report re In-Situ Uranium Activity

Rich,

O.K. I'll forward to Stacey Dwyer at Region 6.

Venice

From: richabitz@gmail.com [mailto:richabitz@gmail.com]

Sent: Tuesday, August 23, 2011 5:08 PM

To: Venice Scheurich

Subject: Re: EPA's Draft Technical Report re In-Situ Uranium Activity

Venice, you are correct. I have sent comments to that end to the technical lead for epa, and we can reinforce this message with region 6. I will be talking with them on Sep 8.

Regards

Rich

Sent from my HTC on the Now Network from Sprint!

----- Reply message -----

From: "Venice Scheurich" <jave241@sbcglobal.net>

Date: Tue, Aug 23, 2011 15:09

Subject: EPA's Draft Technical Report re In-Situ Uranium Activity

To: <richabitz@gmail.com>

Hello, Rich,

Mina and I continue to speak of your superb presentation at Victoria on August 5, and we're grateful that you called our attention to the June 2011 Draft Technical Report: CONSIDERATIONS RELATED TO POST-CLOSURE MONITORING OF URANIUM IN-SITU LEACH/IN-SITU RECOVERY (ISL/ISR) SITES.

As you know, one of the four main things EPA requested that the Science Advisory Board address is the characterization of baseline groundwater chemical conditions in the pre-mining phase and proposed approaches for determining the duration of monitoring to establish baseline conditions.

And, as you so wisely have pointed out in various forums and also in your pre-filed testimony re the Goliad County contested case hearing, the fact that the locations for baseline wells are not determined by a statistically valid method prohibits the legitimate use of the biased data obtained from those sites in any inferential statistical analysis because doing so would violate the mathematical assumptions underlying all inferential statistical methodology.

Further, as we both know, the cherry-picking of locations for baseline wells--no matter how the data from such wells is summarized--is likely to result in highly misleading conclusions about the pre-mining groundwater quality and the post-mining restoration standards.

Perhaps I'm overlooking something in the Draft Technical Report, but I see nothing in Sec. 4.2, Establishing Baseline Conditions, which would eliminate the problem of selection bias in data from the baseline wells. Please, point me in the right direction if the Draft takes care of this issue and I'm not seeing it.

Thanks for taking your time to help with this.

All best wishes to you--and to Thea.

Venice